

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF DISTRICT OF TEXAS

MARY LALIBERTE, et al.,

Plaintiffs,

v.

QUANTA SERVICES, INC., et al.,

Defendants.

Case No.

4:22-cv-03290

(AHB)

VIDEOTAPED DEPOSITION OF

MARIE MCKNIGHT

DATE: Thursday, September 5, 2024

TIME: 9:25 a.m.

LOCATION: Morgan Lewis & Bockius LLP

1000 Louisiana Street #4000

Houston, TX 77002

OFFICIATED BY: Cynthia P. Smith

JOB NO.: 6881123

PAGE 8 IS CONFIDENTIAL

A P P E A R A N C E S

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Carolyn Campbell, In-House Counsel for Quanta
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I N D E X

EXAMINATION:

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By Mr. Block

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NO.

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1 you would not have gotten any more.

2 A Right. Right.

3 Q So we agree about that?

4 A Yes.

5 Q Okay. So for other people -- actually, no,
6 let's leave it there for now. Okay. Okay. Let's
7 look at one more expert report. You can put that one
8 aside. Oh, there we go. Okay. So I'm introducing
9 Exhibit 8, the expert report of Adam Werner.

10 (Exhibit 8 was marked for
11 identification.)

12 MR. ROBERTS: Thanks.

13 BY MR. BLOCK:

14 Q And actually, we can look more at it in a
15 second. I have a few questions, I guess, before. So
16 this -- well, did you know that you had an expert who
17 calculates damages in this case?

18 A Not in particular. But, you know, I don't
19 really expect to know all the details.

20 Q Would it surprise --

21 A It makes sense.

22 Q Yeah. Would it be surprising to you if, for
23 the two funds you invested in -- the DFA International
24 and the American Beacon Fund -- that your expert
25 calculated there were \$0 in damages for those two

1 funds?

2 A Where's he saying that at?

3 Q Yeah. You don't have to look at it yet.
4 I'm just asking if that would surprise you.

5 A Yes.

6 Q And why would it surprise you?

7 A Because if he was saying that there's no
8 damages from it, why are we at this point now?

9 Q So said differently, too, if there were \$0
10 in damages for it, even if you were in the funds when
11 they're being challenged, you wouldn't be making a
12 penny more if there were \$0 in damages?

13 A Didn't we just go through that?

14 Q Yeah, but I'm putting aside the timing
15 issue. Now, I'm asking a separate issue. If your
16 expert calculates there's \$0 in damages, then isn't
17 that another way in which you wouldn't have any
18 financial stake in the outcome?

19 MR. ROBERTS: Object to form.

20 A Yeah, I think that -- I mean, just because
21 you go with expert witnesses -- and then I can't say
22 that that's what he said in here because I haven't
23 read it.

24 But just because, you know, each side
25 provides expert witnesses, it doesn't mean that, you

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15 SARAH COSTA
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24 Dated: September 20, 2024
25